

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
JOHN T. BROOKS, Cal. Bar No. 167793
3 R. RANDAL CRISPEN, Cal. Bar No. 120505
501 West Broadway, 19th Floor
4 San Diego, California 92101-3598
Telephone: 619.338.6500
5 Facsimile: 619.234.3815
Email: jbrooks@sheppardmullin.com
6 rcrispen@sheppardmullin.com

7 Attorneys for Defendants

8 RICHARD A. HUVER, Cal. Bar No. 132945
9 THE HUVER LAW FIRM
655 West Broadway, Suite 1400
10 San Diego, CA 92101
Telephone: 619.971.4883
11 Facsimile: 619.961.4886

12 Attorneys for Plaintiffs

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14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**
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17 PLUM HEALTHCARE GROUP, LLC,
a California corporation; GI PLUM
18 HOLDCO, LLC, a Delaware limited
liability company; and QUINCE
19 HOLDINGS, LLC dba PUEBLO
SPRINGS REHABILITATION
20 CENTER,

21 Plaintiffs,

22 v.

23 ONEBEACON PROFESSIONAL
INSURANCE, a Bermuda corporation;
24 HOMELAND INSURANCE
COMPANY OF NEW YORK, a
25 Minnesota corporation;
and DOES 1 through 30,
26

27 Defendants.
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Case No. 15 CV 02747-W-MDD

The Hon. Thomas J. Whelan

**JOINT MOTION TO DISMISS WITH
PREJUDICE**

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

[Complaint Filed: December 8, 2015]

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Plum
2 Healthcare Group, LLC, GI Plum Holdco, LLC, and Quince Holdings, LLC dba
3 Pueblo Springs Rehabilitation Center (“Plaintiffs”) and Defendants OneBeacon
4 Professional Insurance and Homeland Insurance Company of New York
5 (“Defendants”), hereby jointly move to dismiss Plaintiffs’ complaint against
6 Defendants in the above-captioned action with prejudice. All parties will bear their
7 own costs and attorneys’ fees.

8
9 Dated: January 18, 2018 THE HUVER LAW FIRM

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11 By: s/ Richard A. Huver
12 RICHARD A. HUVER

13 Attorney for Plaintiffs
14 Plum Healthcare Group, LLC, GI Plum Holdco,
15 LLC, and Quince Holdings, LLC dba Pueblo
16 Springs Rehabilitation Center

17 Dated: January 19, 2018 SHEPPARD, MULLIN, RICHTER & HAMPTON
18 LLP

19 By: s/ R. Randal Crispin
20 R. RANDAL CRISPEN

21 Attorneys for Defendants
22 OneBeacon Professional Insurance and
23 Homeland Insurance Company of New York
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